

REMARKS

Upon entry of the present amendment the Claims under consideration are Claims 1-14 and 39-46. New Claims 43-46 are added hereby to specify that it is the fiber loops combining or aggregating in the cross direction that form the channels within the web running in the cross machine direction of the material. It is believed by the Applicants that such limitations clearly define over the cited art involving pleated webs which do not aggregate fiber loops to form channels within the web but merely fold a previously formed web. Independent Claims 1, 2, 39, and 41 are amended hereby to specify that the looped fibers form closed loops and that said closed loops define open spaces within the web. Claims dependent therefrom have also been amended to preserve continuity in this regard. Claims 29-38 were withdrawn by the Examiner. No new matter has been added by the present amendments. As previously noted by the Applicants, throughout the specification, the fibers are referred to as having a "looped" construction (see, e.g., Abstract, lines 5-6; page 4, lines 7-8; and page 14, line 22) leading to a "preponderately open" web construction (see, e.g., page 12, line 9) with a "plurality of channels" (see, e.g., page 15, lines 9-11) in keeping with the functional attributes for the web of improved fluid handling and increased surface area such as for improved filtration (see, e.g., page 1, lines 10-14). It has also previously been noted by the Applicants, and not objected to by the Office, that "loop" as used in the present application is given its ordinary and customary meaning of: *"a curving or doubling of a line so as to form a closed or partly open curve within itself through which another line can be passed or into which a hook may be hooked."*

Applicants have now merely specified that the loop is a closed loop as illustrated by the example of Fig. 2 of the present application. The Detailed Action of 25 April 2003 will now be addressed with reference to any headings and paragraph numbers contained therein.

Claim Rejections 35 USC §102

Per page 2, paragraph 21 (sic) of the Detailed Action, Claims 1 and 39-40 stand as anticipated by Holtman, US Patent 4,578,070 (hereinafter "Holtman"). Applicants respectfully reiterate their arguments from their previous Request for Reconsideration and Amendment After Final Rejection, dated 24 July 2002 and 24 Feb. 2003, respectively, concerning the nonapplicability of Holtman. Applicants particularly point to their discussion of their Request for Reconsideration of 24 July 2002 concerning the present specification and claims, which by definition, exclude the pleating or folding of fully formed webs as shown in the prior art such as Holtman.

Generally, the Holtman reference cited as prior art against the present invention is concerned with the making of a two layer web which is formed and then subsequently tightly corrugated to provide a compact liquid retention material with a differential capillarity between its two layers. Holtman does not disclose the closed looped fibers of the present claims nor the open spaces formed thereby, or their corresponding channels, which are a consequence of the closed looped fiber arrangement of the present invention.

At page 2, the Detailed Action states that the corrugations of Holtman's Fig. 2 correspond to the present invention while at page 3, the Detailed Action states that the corrugations of Holtman's Fig. 2 are identical to the present invention. The Detailed Action has thus pointed to the "open loop" construction of Holtman's Fig. 2. Applicants first respectfully disagree that the sinusoidal waves of pleats, or pre-pleats, in the precursor fabric of Holtman's Fig. 2 would be understood by a person having ordinary skill in the art as a "loop." The sinusoidal waveform of Fig. 2 appears totally open and not closed or partially opened per the accepted definition of a loop.

The amendments to Claims are intended to make clear that the loops created by the present invention provide a web whose fibers are folded to provide closed loops creating open areas. This is in opposition to the known art of pleating webs, e.g., as illustrated by Holtman.

Claim Rejections 35 USC §103

Per page 4, paragraph 19 (sic) of the Detailed Action, Claims 2-14 and 41-42 stand as obvious over Holtman in view of EP 137 644 (hereinafter EP '644). Applicants respectfully reiterate their above arguments concerning the lack of teaching of Holtman with respect to the present claims.

It is the contention of the Detailed Action at page 5, that EP '644 describes loops defining open spaces as seen in EP '644 Figures 10 and 12. Applicants first respectfully disagree with the statement at page 5, first paragraph, of the Detailed Action that the open spaces between the web are elliptical. Applicants believe that all pleatings

and spaces therebetween shown by EP '644 are sinusoidal and therefore cannot be described as elliptical.

Conclusion

The amendments and additions to the present Claims now make clear that the loops created by the present invention are fibers folded to provide closed loops creating open areas within the closed loops and/or within the web. This is in opposition to the known art of pleating webs as illustrated by Holtman or EP '644 which do not singly or in combination teach closed fiber loops creating open spaces within the loops nor the aggregation of loops to form channels within the web.

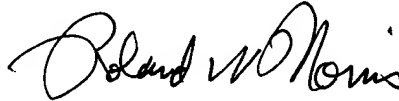
It is believed that each of the Claims has now been placed in condition for allowance. A notice to that effect is earnestly solicited.

If issues remain upon a consideration of the present paper, the Examiner is invited to call Applicants' undersigned attorney for discussion of these amendments at his earliest convenience.

Applicants have added four new independent Claims. One independent Claim and 23 dependent Claims as originally presented have been cancelled or withdrawn. A check in the amount of \$336.00 is included herewith. The Commissioner is authorized to charge any additional fees owing to Deposit Acct. No. 19-3550.

Favorable consideration is requested.

Respectfully submitted,



Roland W. Norris
Registration No. 32,799

Pauley Petersen Kinne & Erickson
2800 West Higgins Road
Suite 365
Hoffman Estates, Illinois 60195
TEL (847) 490-1400
FAX (847) 490-1403